Applicant : Rob K. Corell et al.   Attorney's Docket No.: 07844-350001 / P324
Serial No. : 09/436,044
Filed   : November 8, 1999
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REMARKS

Claims 1-34 are pending in the present application. Claims 1-15 and 18-34 were rejected under 35 U.S.C. § 103(a) over U.S. Patent 6,088,711 ("Fein"). The Applicant has cancelled claims 26-29 and has amended claims 1-5, 8, 9, 18-25, 33, and 34. No new matter has been added. In view of the foregoing amendments and the following arguments, the Applicant respectfully submits that all claims are in condition for allowance.

1.   Response to Rejections under Section 103

Claims 1-15 and 18-34 were rejected as unpatentable over Fein. The Applicant respectfully traverses the rejection.

As amended, claim 1 recites a method in which a formatted document is received that has formatted text having multiple words, each of which has a fixed position on a page and an associated set of font properties. The recited method partitions the text into groups of words based on the fixed positions of the words on their respective pages, the font properties of the words, or both. An element is assigned to each of two or more groups of words based on the fixed positions of the words on their respective pages, the font properties of the words, or both, and an element style is derived for the assigned element based on the multiple groups of words to which the element is assigned.

Fein discloses a method and system for defining a style for a paragraph after a user creates or edits a paragraph in a document. Column 4, lines 44-46; column 13, lines 5-8. In Fein's method, a trigger is received, indicating that the user has created or modified a paragraph. Column 6, lines 52-58. The trigger is an indication to a program that the program should apply a style to the newly created or edited paragraph. Column 6, lines 52-58. After this step, Fein identifies the type of the created or edited paragraph and applies a style to the paragraph. Column 7, lines 6-8; Abstract. A new style may be defined for and applied to the paragraph, or an existing style may be applied to the paragraph. Abstract.

Fein does not disclose or suggest partitioning the formatted text of the document into a plurality of groups of words based on the fixed positions of the words on their respective pages,

the font properties of the words, or both, which claim 1 expressly requires. Instead, Fein's method relies on a trigger generated in response to a user action and a user-created paragraph structure to partition the text. Furthermore, the words in Fein's document do not have a fixed position on a page when Fein's method operates; the words can still be moved by editing, and therefore the positions of the words in Fein's document necessarily are relative positions.

Fein also does not disclose or suggest deriving a style based on two or more groups of words. Claim 1 expressly requires that an element be assigned to multiple groups of words and that an element style be derived for the element based on the multiple groups of words to which the element is assigned. Fein's method defines a style based on only a single group of words (a single paragraph). After Fein's method defines the style, the style may be assigned to other paragraphs, but the style is defined based on only the first paragraph to which it is assigned. For at least the foregoing reasons, claim 1 is allowable over Fein.

In addition, the Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time the invention was made to partition the document according to font properties of the words or the positions of the words. The Applicant respectfully disagrees. The support that the Examiner cites from Fein is directed to determining the style of a group of words, not to partitioning text.

Claims 2-20 depend directly or indirectly from claim 1, and are allowable for at least that reason.

Claim 21 is a computer program product claim that includes limitations corresponding to those of claim 1. Claims 22-25 and 30-34 depend directly or indirectly from claim 21, and are allowable for at least that reason.

Claims 26-29 have been cancelled, rendering the rejection moot.

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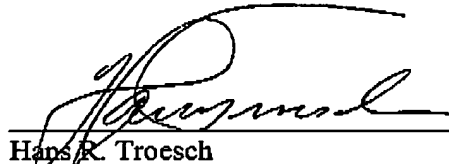Filed   : November 8, 1999
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2.   **Conclusion**

The Applicant submits that all claims are in condition for allowance, and asks that all

claims be allowed. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _13 Feb 2004_

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